

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION**

IN THE MATTER OF:

KEITH EVERETT BEBER  
DANIELLE RENE BEBER

Debtors

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CASE NO. 24-330168-pes  
CHAPTER 13

**OBJECTION TO CONFIRMATION**

COMES NOW, the Chapter 13 Trustee, by counsel, and objects to confirmation of the proposed Chapter 13 Plan and states:

1. Trustee objects to confirmation as the Plan fails to meet the best interests of creditors test under 11 U.S.C. §1325(a)(4) as the Trustee has requested but not yet received the date of filing bank balances for Debtor's financial accounts requested pursuant to F.R.B.P. Rule 4002(b). This information is necessary to determine if there is any nonexempt equity in these accounts. The Trustee does not have date of filing statements for the following accounts:
  - a. Cash App. Listed on Schedule A/B.
  - b. Everwise checking account ending in 7528. Listed on Schedule A/B.
  - c. Interra checking account ending in 4048. Listed on Schedule A/B.
  - d. Interra savings account ending in 4000. Listed on Schedule A/B.
2. The Internal Revenue Service filed an estimated priority tax claim for the tax year ending 2023 in the amount of \$11,239.40. If not objected to, amended, or withdrawn, the claim will be deemed allowed as a priority claim. The estimated priority tax claim for the Internal Revenue Service should be objected to if the

Debtors assert that they owed no income taxes to the IRS for the year ending 2023.

WHEREFORE, the Chapter 13 Trustee objects to confirmation of the proposed Chapter 13 Plan and requests the Court deny confirmation and for any and all other just and proper relief in the premises.

DATE: April 8, 2024

Respectfully submitted,

/s/ Michael J. Kulak  
Michael J. Kulak  
Attorney for Chapter 13 Trustee  
Office of the Chapter 13 Trustee  
PO Box 11550  
South Bend, IN 46634  
(574) 254-1313

**CERTIFICATE OF SERVICE**

I certify that the foregoing was served on the following parties by CM/ECF or by placing the same in the United States Mail, first class postage pre-paid on April 8, 2024:

Keith Everett Beber and Danielle Rene Beber; 537 Capitol Blvd, Elkhart, IN 46516  
James Tamke; jamestamke@gmail.com  
United States Trustee; USTPRegion10.SO.ECF@usdoj.gov

/s/ Michael J. Kulak  
Michael J. Kulak  
Office of the Chapter 13 Trustee